

Exhibit 140

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1



EXHIBIT / ATTACHMENT

41

(To be scanned in place of tab)

COMMERCE BANK
P O BOX 858
COLLEGE PARK MD 20740

011 01 01 PAGE: 1
DATE: 04/30/98 ACCOUNT: 0424
DOCUMENTS: 1

TELEPHONE: 301-220-1575

HUMANA CHARITABLE TRUST 30-0
P O BOX 1297 0
HERNDON VIRGINIA 20170 1

MONEY MARKET ACCOUNT 0424

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE	
BALANCE LAST STATEMENT			03/31/98	5841,148.35	
CHECK	5800,000.00		04/02/98	41,148.35	0402-0200082400
INTEREST		626.35	04/30/98	41,774.70	
BALANCE THIS STATEMENT			04/30/98	41,774.70	
TOTAL CREDITS (1)		626.35			
TOTAL DEBITS (1)	5,800,000.00				

YOUR CHECKS SEQUENCED

DATE...CHECK #.....AMOUNT	DATE...CHECK #.....AMOUNT	DATE...CHECK #.....AMOUNT
04/02 5800,000.00		0402-0200082400

----- I N T E R E S T -----

AVERAGE LEDGER BALANCE:	234,481.68	INTEREST EARNED:	626.35
AVERAGE AVAILABLE BALANCE:	234,481.68	DAYS IN PERIOD:	30
INTEREST PAID THIS PERIOD:	626.35	ANNUAL PERCENTAGE YIELD EARNED:	3.30%
INTEREST PAID 1998:	5,837.44		
TAX IDENTIFICATION NUMBER:	**PROVIDE**		
INTEREST RATE:	3.2500%		



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

12/29/2003 16:05 FAX 703 471 7951

ICE SAC/PC

0003

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Humana Charitable Trust**VIA TELEFAX 301 220 2697**

To: Tom Herman
Vice President
Commerce Bank

From: M. Yaqub Mirza *M. Y. Mirza*

Subject: Wire Transfer

Date: March 31, 1998

You are kindly requested to wire from Humana Charitable Trust Account # [REDACTED] 0424 the amount of \$5,800,000 (Five Million Eight Hundred Thousand Dollars) value dated April 2, 1998 as follows:

Bank: Chase Manhattan Bank
New York, N.Y.

ABA # 021000021

for credit to Account No. [REDACTED] 1902 of

Chase Manhattan Private Bank
(Jersey) Channel Islands JE4 80H

Tel: 01 531 626 262

for further credit to Account No. [REDACTED] 5383 of Shaikh Sulaiman A. Al Rajhi

Ref: Payment Key Overseas loan

Best Regards.

TRANSACTION REPORT

MAR-31-98

FOR: MARJAC INVESTMENTS, INC. 703 471 1211

SEND

DATE	START	RECEIVER	PAGES	TIME	NOTE
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MAR-31	10:52 AM	COMMERCE B	1	46"	OK
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Page 1 of 1

12/29/2003 16:05 FAX 703 471 7951

ICE SAC/DC

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04/01/1998 09:09

09356-1-4602040

ABDULLAH S. AL RAJHI

PAGE 01

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MSG NO : 0030
TO : Dr. M. Y. Mirza
Fax : 703 471 1211
date : 04.01.98

MESSAGE:

Re : USD24.0 m

As Salam Alaykum,

Thank you for your message of March 31. Please make the payment of the above amount to the following account:-

Ac No [REDACTED] REF. 265629 01
Chase Manhattan Private Bank,
PO Box 127, Chase House, Grenville Street
St. Helier, Jersey JE4 8QH
Channel Islands
Favour Laith Limited

Wa Asalamu Alyakum,

Buehra

Humana Charitable Trust
G:\SCANNED DOCUMENTS 2\TIFF IMG\L0700400000530

TELEFAX 301 220 2697

Tom Herman
Vice President
Commerce Bank

From: M. Yaqub Mirza *M. Y. Mirza*
Subject: Wire Transfer
Date: March 31, 1998

You are kindly requested to wire from Humana Charitable Trust Account # [REDACTED] 0424 the amount of \$5,800,000 (Five Million Eight Hundred Thousand Dollars) value dated April 2, 1998 as follows:

Bank: Chase Manhattan Bank
New York, N.Y.

ABA # 021000021

for credit to Account No [REDACTED] 1902 of

Chase Manhattan Private Bank
(Jersey) Channel Islands JE4 8QH

Tel: 01 531 626 262

for further credit to Account No [REDACTED] 5383 of Shaikh Sulaiman A. Al Rajhi

Ref 26562901

Ref: Payment Key Overseas loan

Best Regards.

555 Grove Street, Suite #110, Herndon, VA 20170 Tel: (703) 471-9494 Fax: (703) 471-1211



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

12/29/2003 10:05 FAX 703 471 7851

ICE SAC/DC

Ddd

To:

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Mr. Bushra Ahmed
Office of Mr. Abdullah S. Al Rajhi

From:

M. Yaqub Mirza

Subject:

Payment of loan

Date:

April 1, 1998

Assalamu 'Alaikum and Eid Mubarak

Reference my discussion with Mr. Abdullah Al Rajhi and your fax, we wish to inform you that we have made the following transfers yesterday:

1. Commerce Bank, Maryland	\$5.8 m.
2. Credit Agricole Indosuez Zurich	12.2 m.
3. Bank Leu, Geneva	<u>6.0 m</u>
	\$24.0 m.

to Chase (New York) for further credit to Chase (Jersey), Channel Islands, Acct. #
5383 of Shaikh Sulaiman.

Value Date: April 2

Please acknowledge receipt of funds.

Thanks.

Wassalaam.

TRANSACTION REPORT

APR-01-98 08:36 AM

FOR: DAYONE INVESTMENTS, INC. 703 471 1211

SEND

DATE	START	RECEIVER	PAGES	TIME	NOTE
APR-01	08:35 AM	A.S. RAJHI	1	46"	OK



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

COMMERCE BANK
P O BOX 898
COLLEGE PARK MD 20740

011 01 01 PAGE: 1
DATE: 12/31/98 ACCOUNT: 0424
DOCUMENTS: 1

TELEPHONE: 301-220-1575

HUMANA CHARITABLE TRUST 30-0
P O BOX 1297 0
HERNDON VIRGINIA 20170 1

MONEY MARKET ACCOUNT 0424

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE	
BALANCE LAST STATEMENT			11/30/98	6707,494.20	
MISCELLANEOUS CREDIT		100,000.00	12/08/98	6807,494.20	1208-0200004292
WIRE FR GROVE CORP. REF: NONE		30,000.00	12/09/98	6837,494.20	1209-6500001700
WIRE FEE 10.00	10.00		12/09/98	6837,484.20	1209-6500001900
WIRE TO CHASE NYC FBO: S. RAJHI 6800,000.00	6800,000.00		12/14/98	37,484.20	1214-6500000100
CHECK # 1001 4,836.58	4,836.58		12/29/98	32,647.62	1229-0100000170
INTEREST 6,069.01		6,069.01	12/31/98	38,716.63	
BALANCE THIS STATEMENT			12/31/98	38,716.63	
TOTAL CREDITS (3) 136,069.01					
TOTAL DEBITS (3) 6,804,846.58					

YOUR CHECKS SEQUENCED

DATE...CHECK #.....AMOUNT DATE...CHECK #.....AMOUNT DATE...CHECK #.....AMOUNT

12/29 1001 4,836.58 1229-0100000170

----- I N T E R E S T -----

AVERAGE LEDGER BALANCE: 2,858,309.04 INTEREST EARNED: 6,069.01
AVERAGE AVAILABLE BALANCE: 2,858,309.04 DAYS IN PERIOD: 31
INTEREST PAID THIS PERIOD: 6,069.01 ANNUAL PERCENTAGE YIELD EARNED: 2.53%
INTEREST PAID 1998: 55,795.66
TAX IDENTIFICATION NUMBER: **PROVIDE**
INTEREST RATE: 2.5000%



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

COMMERCE BANK
REQUEST FOR WIRE TRANSFER

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Date Dec 8, 98 REF # _____AMOUNT: 6,800,000.00 (PLUS APPLICABLE CHARGES)
(U.S. Dollars)

(Six million eight hundred thousand)

BANK TO RECEIVE WIRE

ABA/Routing No. _____

Bank Short Name _____

Bank Name CHASE MANHATTAN PRIVATE BANK

Address _____

St Hiller, Jersey JE4 8QH

FOR CREDIT TO

Name(s) SHAIKH SULAIMAN A. ALRAJHIAccount Number [REDACTED] 5383Special Instr. Payout of loan

CUSTOMER INFORMATION

VALUE DATE: Dec 14, 98Account Name(s) Humana Charitable TrustAddress P.O. Box 1297Herndon, VA 20170Telephone Number 703-471-9494 Account Number [REDACTED] 0424

I hereby authorize Commerce Bank (the Bank) to charge my account as listed above. I understand that the Bank is not responsible for any loss which may be sustained by acting upon my wire transfer instructions, except for a loss caused by the Bank's error or omission.

[Signature]
Customer's Signature_____
Customer's Identification

BRANCH MANAGER APPROVAL _____



EXHIBIT / ATTACHMENT

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(To be scanned in place of tab)

COMMERCE BANK
P O BOX 898
COLLEGE PARK MD 20740

011 01 01 PAGE: 1
DATE: 08/31/98 ACCOUNT: 0424
DOCUMENTS: 0

TELEPHONE: 301-220-1575

HUMANA CHARITABLE TRUST 30-0
P O BOX 1297 0
HERNDON VIRGINIA 20170 0

MONEY MARKET ACCOUNT 0424

DESCRIPTION	DEBITS	CREDITS	DATE	BALANCE
BALANCE LAST STATEMENT			07/31/98	42,117.85
MISCELLANEOUS CREDIT		3000,000.00	08/12/98	3042,117.85
INTEREST		5,458.72	08/31/98	3047,576.57
BALANCE THIS STATEMENT			08/31/98	3047,576.57

0812-0200222400

TOTAL CREDITS (2) 3,005,458.72
TOTAL DEBITS (0) .00

----- I N T E R E S T -----

AVERAGE LEDGER BALANCE: 1,977,601.72 INTEREST EARNED: 5,458.72
AVERAGE AVAILABLE BALANCE: 1,977,601.72 DAYS IN PERIOD: 31
INTEREST PAID THIS PERIOD: 5,458.72 ANNUAL PERCENTAGE YIELD EARNED: 3.30%
INTEREST PAID 1998: 11,639.31
TAX IDENTIFICATION NUMBER: **PROVIDE**
INTEREST RATE: 3.2500%

DEBIT

**GENERAL
LEDGER**

COMMERCE BANK
COLLEGE PARK, MD

FEDERAL RESERVE BANK

ACCOUNT NUMBER [REDACTED] 6780

DATE: 8-12-98

DESCRIPTION

AMOUNT

George W. T. Hermann & Charitable Co.

CONCRETE ENTRY

APPROVED BY _____

TOTAL	3,000	00	00	00
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6780

DATE 3-12-93

COMMERCE BANK
COLLEGE PARK, MD

042-4

BY _____ BG
Authorized

WE CREDIT YOUR ACCOUNT \$ 1,000,000.00

FOR Incoming Wire Transfer from First Union Va

Orig: Saar Foundation

Humana Charitable Trust

P. O. Box 1297

Herndon, Virginia 20170

DE WIT FAL
POWERS 7-5
EINER A-DJ
D-12-500K

MISC. CREDIT

04 2400